

Determination of NEPA Adequacy (DNA)

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Chapter 1. Determination of NEPA Adequacy (DNA)

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U.S. Department of the Interior
Bureau of Land Management

OFFICE: Eastern Interior Field Office, LLAKF02000

TRACKING NUMBER: DOI-BLM-AK-F020–2013–0021–DNA

CASEFILE/PROJECT NUMBER: FF096603

PROPOSED ACTION TITLE/TYPE: Eco-tourism Guided Float Trips

LOCATION/LEGAL DESCRIPTION: Birch Creek National Wild and Scenic River

APPLICANT (if any): Midnight Sun Council Boy Scouts of America

A. Description of Proposed Action and any applicable mitigation measures

Midnight Sun Council, BSA proposes to camp and conduct organized river operations utilizing various sites for overnight camping along Birch Creek National Wild and Scenic River.

Access will be by vehicle to Upper Birch Creek Wayside at Steese Highway MP 94. The following sites, primarily gravel bars and associated adjacent uplands will be used (however use is not limited to these sites):

Table 1.1. Proposed Camp Locations

T 5 N	R 10 E	Sec. 4	FM	Harrington Creek	Circle B-4
T 5 N	R 12 E	Sec. 11	FM	Clums Fork	Circle B-3
T 6 N	R 15 E	Sec. 9	FM	Portage Creek	Circle B-2
T 6 N	R 17 E	Sec. 19	FM	River mile 73	Circle B-1
T 7 N	R 17 E	Sec. 21	FM	River mile 81	Circle B-2

Take-out at Lower Birch Creek Wayside, Steese Highway MP 140

The Midnight Sun Council is planning two trips per year with an average of nine scouts and three leaders for an average of eight days per trip within Birch Creek National Wild and Scenic River Corridor.

Midnight Sun Council practices minimum impact — Leave No Trace — camping techniques. All cooking will be on backpacking stoves with food storage in five gallon and/or backpack sized bear resistant containers. All drinking water will be filtered. Honey buckets will be used for all human waste. There will be incidental fishing with the practice of catch and release. One or two fish may be cooked per trip. Some hiking may take place at campsite locations if the terrain is suitable. No more than eight canoes will be used on any single trip.

The Midnight Sun Council has a trip emergency plan. There will be at least one person on each trip that has completed training in Wilderness First Aid, Advanced CPR for Rescuers, and completed a seven day BSA trekking certification program. Each trip leader will have a Satellite phone with emergency numbers and BSA has a doctor on call 24 hours a day. Trip leaders have completed at least three trips on Birch Creek prior to leading a trip. Each participant receives training in Leave-No-Trace camping ethics, animal awareness and bear spray use, and weather

identification. Participants utilize the buddy system in that no-one goes out alone and have a set of maps for the river. The group carries two GPSs and a first aid kit appropriate for the group size.

B. Land Use Plan Conformance

LUP Name*	<u>Record of Decision, Resource Management Plan for the Steese National Conservation Area</u>	Date	<u>February 6, 1986</u>
Other Document	<u>River Management Plan, Birch Creek, A Component of the National Wild and Scenic Rivers System</u>	Approved:	<u>December, 1983</u>

**List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto*

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

Prescriptions Common to All Management Units, Recreation Management — Management Direction; Visitor Use Management and Information: Special Recreation Use Permits are required for commercial uses such as commercial outfitting and guiding and commercial river trips, etc. (Page 6).

The River Management Plan allows for Special Recreation Permits under Item 7 — Visitor Management; Action 7.3: Permits are required for all commercial river guides and outfitters operating within the river corridor (Page 31).

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

EA AK-024-06-036; 7-15-2007

DOI-BLM-AK-02000-2009-0017-DNA; 5-24-2010

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes. The Proposed Action (the use of use of Birch Creek Wild River with associated gravel bars and uplands for camping, fishing and other recreational activities associated with a primitive type river experience) is substantially the same as previously reviewed under the above Environmental Assessment EA-AK-024-06-036. The number of trips is reduced from 4 trips per year to 2 trips per year. The number of clients and guides per trip is also reduced from 16 per trip to 12 persons per trip.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource value?

Yes. The existing EA analyzed the proposed action, a specific campsite alternative and the no action alternative. The proposed action alternative, the specific campsite alternative and the no action alternative are appropriate alternatives with respect to the current proposed action. The current environmental concerns, interests, resource values, and circumstances for the currently proposed action do not differ substantially from those considered in the existing EA.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessments, recent endangered species listings, updated lists of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. A review of the existing EA by resource specialists indicated no additional relevant information needs to be addressed in the EA for this proposed action. It was determined that any new information or relevant circumstances were insignificant with regard to analysis of the proposed action. The proposed action will not impact lands with wilderness characteristics. The proposed action will not reduce the number of acres in the wilderness inventory unit, the area will retain its natural appearance. The proposed action provides opportunities for primitive and unconfined recreation and will not substantially impact solitude of users.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes. The environmental assessment, EA-AK-024-06-036, approved the use of Birch Creek Wild River with associated gravel bars and uplands for camping, fishing and other recreational activities associated with a primitive type river experience. The EA identified specific measures and conditions of approval which will apply to this operation. Direct and indirect impacts are essentially unchanged. The analysis in the existing NEPA document is sufficient to the proposed action. Environmental impacts were identified in the existing EA under the following elements: Cultural Resources, Essential Fish Habitat- Wildlife/Aquatic Resources, Fire, Invasive, Nonnative Species, Recreation, Subsistence, Threatened or Endangered Species, Vegetation, Visual Resource Management, Wastes - Hazardous or Solid, Wild and Scenic Rivers, Wildlife/Terrestrial. The direct and indirect impacts identified under these elements are substantially unchanged. These include:

- known cultural materials could be disturbed or collected;
- temporary displacement of rearing and spawning salmon could occur;
- introduction and spread of nonnative plants;
- impacts to American peregrine falcons could occur;
- impacts to water quality resulting from grey water and human waste and infection of humans from unfiltered water could occur;
- impacts to the primitive setting of the wild river corridor could occur;
- wildfires could occur from cooking and warming fires;
- increased use on the river could impact other users and result in limited firewood;
- caribou and moose could be displaced during hunting season;

- increased potential for vegetation damaged through trampling and hardening of campsites and waste disposal;
- short-term changes in visual quality and naturalness;
- impacts to fisheries due to stream bank and spawning and rearing site disturbance; and
- disturbance of waterfowl and raptors and attraction of wildlife with possible destruction to protect life and property.

The existing NEPA document analyzes site-specific impacts. The current proposed action is not substantially different. An assessment of archaeological and historic resources, ANILCA Section 810 Compliance document, Endangered Species Consultation Record for Section 7 of the Endangered Species Act and an Essential Fish Habitat Clearance specific to the proposed action are included. There are no anticipated impacts to cultural resources, subsistence, endangered species or essential fish habitat by the proposed action.

5. Are there public involvement and interagency reviews associated with existing NEPA document(s) adequate for the current proposed action?

Yes. Wide public involvement and interagency review were not necessary for the existing EA, and internal review by an interdisciplinary team was determined to be sufficient. There are no new public concerns that would require public involvement or interagency review for the current proposed action. Thus, the interdisciplinary team analysis associated with the existing NEPA document continues to be adequate for the current proposed action.

E. Persons/Agencies/BLM Staff Consulted

Table 1.2. List of Preparers

Name	Role	Discipline
Gary Lewis	Midnight Sun Council BSA	
Collin Cogley	Outdoor Recreation Planner	Fire Management
Jim Herriges	Wildlife Biologist	Areas of Critical Environmental Concern; Invasive, Nonnative Species; Subsistence; Threatened or Endangered Species; Vegetative Resources; Wildlife — Terrestrial
Rebecca Hile	Physical Scientist	Wastes, Hazardous or Solid
Ben Kennedy	Hydrologist	Air Quality; Floodplains; Soils; Water Quality — Surface or Ground; Wetlands — Riparian Zones
Holli McClain	Outdoor Recreation Planner	Environmental Justice; Farm Lands; Recreation; Socioeconomic; Travel Management; Visual Resources; Wild and Scenic Rivers; Lands with Wilderness Characteristics
Robin Mills	Archaeologist	Cultural Resources; Native American Religious Concerns
Jason Post	Fisheries Biologist	Essential Fish Habitat; Wildlife — Aquatic
Matt Reece	Geologist	Mineral Resources
Vic Wallace	Realty Specialist	Realty

Note

Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirement of NEPA.

/s/ Holli McClain

Signature of Project Lead

/s/ Jeanie Cole

Signature of NEPA Coordinator

6/4/13

/s/ Michelle Ethun

Signature of the Responsible Official

Date

Note:

The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.